

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NORTH CAROLINA  
SOUTHERN DIVISION

FILED IN OPEN COURT  
ON 3-9-2016  
Julie Richards Johnston, Clerk  
US District Court  
Eastern District of NC JJA

NO. 7:16-CR-21-1 (1)  
NO. 7:16-CR-21-2 (1)  
NO. 7:16-CR-21-3 (1)

UNITED STATES OF AMERICA )

v. )

I N D I C T M E N T

VICTOR SAAVEDRA-SANTIAGO )

a/k/a, "MARCELINO SAAVEDRA-SANTIAGO" )

a/k/a, "BRANDO CABALLERO" )

JOSE LUIS QUIROZ )

FELIPE DE JESUS ACOSTA-GONZALEZ )

a/k/a, "LITTLE JESSE" )

a/k/a, "GARAGE JESSE" )

The Grand Jury charges that:

COUNT ONE

CONSPIRACY

From a date unknown to the Grand Jury, but no later than 2009, and continuing up to in or about March 2013, in the Eastern District of North Carolina and elsewhere, VICTOR SAAVEDRA-SANTIAGO, also known as "Marcelino Saavedra-Santiago," and "Brando Caballero," JOSE LUIS QUIROZ, and FELIPE DE JESUS ACOSTA-GONZALEZ, also known as "Little Jesse," and "Garage Jesse," the defendants herein, did knowingly and intentionally combine, conspire, confederate, agree and have a tacit understanding with each other and other persons, known and unknown to the Grand Jury, to knowingly and intentionally distribute and possess with the intent to distribute cocaine, a

Schedule II controlled substance, and marijuana, a Schedule I controlled substance, contrary to the provisions of Title 21, United States Code, Section 841(a)(1).

Quantity of Controlled Substance Involved in the Conspiracy

With respect to VICTOR SAAVEDRA-SANTIAGO, also known as "Marcelino Saavedra-Santiago," and "Brando Caballero," the amount of cocaine involved in the conspiracy attributable to him as a result of his own conduct, and the conduct of other conspirators reasonably foreseeable to him, is five (5) kilograms or more of cocaine, in violation of Title 21, United States Code, Section 841(b)(1)(A).

With respect to VICTOR SAAVEDRA-SANTIAGO, also known as "Marcelino Saavedra-Santiago," and "Brando Caballero," the amount of marijuana involved in the conspiracy attributable to him as a result of his own conduct, and the conduct of other conspirators reasonably foreseeable to him, is one-hundred (100) kilograms or more of marijuana, in violation of Title 21, United States Code, Section 841(b)(1)(B).

With respect to JOSE LUIS QUIROZ and FELIPE DE JESUS ACOSTA-GONZALEZ, also known as "Little Jesse," and "Garage Jesse," the amount of cocaine involved in the conspiracy attributable to each as a result of their own conduct, and the conduct of other conspirators reasonably foreseeable to them, is

a quantity of cocaine, in violation of Title 21, United States Code, Section 841(b)(1)(C).

With respect to JOSE LUIS QUIROZ and FELIPE DE JESUS ACOSTA-GONZALEZ, also known as "Little Jesse," and "Garage Jesse," the amount of marijuana involved in the conspiracy attributable to each as a result of their own conduct, and the conduct of other conspirators reasonably foreseeable to them, is a quantity of marijuana, in violation of Title 21, United States Code, Section 841(b)(1)(D).

All in violation of Title 21 United States Code, Section 846.

#### COUNT TWO

On or about January 4, 2013, in the Eastern District of North Carolina, VICTOR SAAVEDRA-SANTIAGO, also known as "Marcelino Saavedra-Santiago," and "Brando Caballero," and JOSE LUIS QUIROZ, the defendants herein, aiding and abetting each other, did knowingly and intentionally distribute a quantity of marijuana, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1), and Title 18, United States Code, Section 2.

#### COUNT THREE

On or about January 31, 2013, in the Eastern District of North Carolina, VICTOR SAAVEDRA-SANTIAGO, also known as "Marcelino Saavedra-Santiago," and "Brando Caballero," and

FELIPE DE JESUS ACOSTA-GONZALEZ, also known as "Little Jesse," and "Garage Jesse," the defendants herein, aiding and abetting each other, did knowingly and intentionally distribute a quantity of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1) and Title 18, United States Code, Section 2.

COUNT FOUR

On or about February 1, 2013, in the Eastern District of North Carolina, FELIPE DE JESUS ACOSTA-GONZALEZ, also known as "Little Jesse," and "Garage Jesse," the defendant herein, did knowingly and intentionally possess with the intent to distribute a quantity of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

COUNT FIVE

On or about March 14, 2013, in the Eastern District of North Carolina, FELIPE DE JESUS ACOSTA-GONZALEZ, also known as "Little Jesse," and "Garage Jesse," the defendant herein, did knowingly and intentionally distribute a quantity of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

### FORFEITURE NOTICE

The defendants are given notice of the provisions of 21 United States Code, Section 853, that all of their interest in all property specified herein is subject to forfeiture.

As a result of the foregoing offenses, the defendants shall forfeit to the United States any and all property constituting, or derived from, any proceeds the defendant obtained directly or indirectly as a result of the said offense and any and all property used or intended to be used in any manner or part to commit and to facilitate the commission of the offenses alleged, or any property traceable to such property.

If any of the above-described forfeitable property, as a result of any act or omission a defendant,

- (1) cannot be located upon the exercise of due diligence;
- (2) has been transferred or sold to, or deposited with, a third person;
- (3) has been placed beyond the jurisdiction of the court;
- (4) has been substantially diminished in value; or
- (5) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section

853(p), to seek forfeiture of any other property of said defendant up to the value of the above forfeitable property.

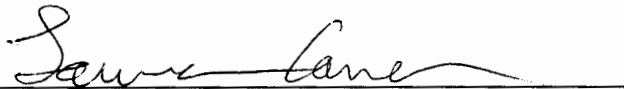
**REDACTED VERSION**

A TRUE BILL: Pursuant to the E-Government Act and the federal rules, the unredacted version of this document has been filed under seal.

                      
FOREPERSON

DATE: 3-8-2016

JOHN STUART BRUCE  
Acting United States Attorney



BY: LAWRENCE J. CAMERON  
Assistant United States Attorney